

1 **GARY LIVAICH, SBN 084186**
2 **J. RUSSELL CUNNINGHAM, SBN 130578**
3 **BRIAN MANNING, SBN 241512**
4 **KRISTEN RENFRO, SBN 259162**
5 **DESMOND, NOLAN, LIVAICH & CUNNINGHAM**

6 1830 15th Street
7 Sacramento, California 95811
8 Telephone: (916) 443-2051
9 Facsimile: (916) 443-2651
10

11
12 Attorneys for DF Properties, KV Sierra Vista, LLC,
13 Baseline 80 Investors, LLC, Baseline P&R, LLC, John J. Guerra Jr.,
14 Successor Trustee of the Cyril G. Barbaccia Irrevocable
15 Trust dated December 15, 1976, Joiner Limited Partnership,
16 Brian T. Howe and Stephen J. Norman
17

18 **UNITED STATES BANKRUPTCY COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA**
20 **SAN FRANCISCO DIVISION**
21

22 In re:

23 **PG&E CORPORATION,**

24 **-and-**

25 **PACIFIC GAS & ELECTRIC COMPANY,**

26 **Debtors.**

27 ☐ Affects PG&E Corporation
28 ☐ Affects Pacific Gas & Electric Company
☒ Affects both Debtors

**All papers shall be filed in the Lead Case, No.
19-30088(DM)*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case) (Jointly Administered)

**NOTICE OF HEARING ON MOTION
FOR RELIEF FROM AUTOMATIC
STAY**

Date: April 23, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United State Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Objection Deadline: April 16, 2019 at
4:00p.m. (Pacific)

1 **PLEASE TAKE NOTICE** that on January 29, 2019 (the "Petition Date"),
2 PG&E Corporation and Pacific Gas and Electric Company, as debtors and debtors
3 in possession (the "**Debtors**") in the above-captioned chapter 11 cases (the
4 "**Chapter 11 Cases**"), each filed a voluntary petition for relief under chapter 11 of
5 title 11 of the United States Code (the "**Bankruptcy Code**") with the United States
6 Bankruptcy Court for the Northern District of California (San Francisco Division)
7 (the "**Bankruptcy Court**").

8
9 **PLEASE TAKE FURTHER NOTICE** that the Bankruptcy Court will hold
10 a hearing on **April 23, 2019, at 9:30 a.m. (Pacific Time)** (the "**Omnibus**
11 **Hearing**") in the courtroom of the Honorable Dennis Montali, United States
12 Bankruptcy Judge, Courtroom 17, 16th Floor, 450 Golden Gate Avenue, San
13 Francisco, California 94102.

14
15 **PLEASE TAKE FURTHER NOTICE** that, in addition to any other matters
16 scheduled for the **Omnibus Hearing**, the **Bankruptcy Court** is scheduled to hear
17 the **MOTION OF REAL PROPERTY OWNERS FOR AN ORDER CONFIRMING THE**
18 **AUTOMATIC STAY DOES NOT BAR CONTINUATION OF EMINENT DOMAIN**
19 **ACTIONS FILED BY THE DEBTOR PRE-PETITION AND GRANTING RELIEF**
20 **FROM STAY FOR CAUSE TO THE EXTENT IT MIGHT OTHERWISE BAR ACTS**
21 **RELATED TO THE PROCEEDINGS, INCLUDING THE PAYMENT OF JUST**
22 **COMPENSATION.**

23
24
25 **PLEASE TAKE FURTHER NOTICE** that any oppositions or responses to
26 the Motion must be in writing, filed with the Bankruptcy Court, and served on the
27 counsel for the Debtors at the above-referenced addresses so as to be received by **no**
28

1 **later than 4:00 p.m. (Pacific Time) on April 16, 2019.** Any oppositions or
2 responses must be filed and served on all "Standard Parties" as defined in, and in
3 accordance with, the Order Implementing Certain Notice and Case Management
4 Procedures entered on March 6, 2019 [Dkt No. 759] ("**Case Management Order**").
5
6 **Any relief requested in the Motion may be granted without a hearing if no**
7 **opposition is timely filed and served in accordance with the Case**
8 **Management Order.** In deciding the Motion, the Court may consider any other
9 document filed in these Chapter 11 Cases and related Adversary Proceedings.

10 **PLEASE TAKE FURTHER NOTICE** that copies of the Motion and its
11 supporting papers can be viewed and/or obtained: (i) by accessing the Court's
12 website at <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of
13 the Court at 450 Golden Gate Avenue, San Francisco, CA 94102, or (iii) from the
14 Debtors' notice and claims agent, Prime Clerk LLC , at
15 <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for
16 U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail at:
17 pgeinfo@primeclerk.com. Note that a PACER password is needed to access
18 documents on the Bankruptcy Court's website.

19
20
21 Date: April 1, 2019

DESMOND, NOLAN, LIVAICH & CUNNINGHAM

22
23 By: /s/ KRISTEN RENFRO

KRISTEN RENFRO

24 Attorneys for DF Properties, KV Sierra Vista,
25 LLC, Baseline 80 Investors, LLC, Baseline
26 P&R, LLC, John J. Guerra Jr., Successor
27 Trustee of the Cyril G. Barbaccia Irrevocable
28 Trust dated December 15, 1976, Joiner
Limited Partnership, Brian T. Howe and
Stephen J. Norman